

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS AT BOSTON

HEATHER KIERNAN,

Plaintiff,

-v-

CIVIL NO. 04-10131 RBC

ARMORED MOTOR SERVICE OF
AMERICA, INC., and
FRANCESCO CIAMBRIELLO

Defendants.

AFFDAVIT OF WILLIAM J. McLEOD

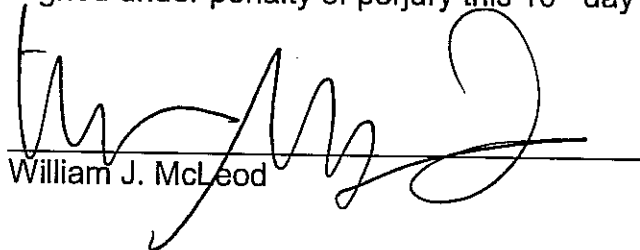
Now comes William J. McLeod, being duly sworn does hereby depose and say:

1. I am over the age of 18 and understand the meaning and obligation of an oath. All information herein is based on my personal knowledge.
2. All of the documents filed herewith were copied by me or under my supervision.
3. Exhibit A, filed herewith, are true and complete copies of some of the documents received from the Hartford pursuant to a subpoena, along with a true and complete copy of the accompanying affidavit.
4. Exhibit B, filed herewith, are true and complete copies of certain pertinent pages of the deposition transcript of John Otrando.
5. Exhibit C, filed herewith, are true and complete copies of certain pertinent pages of the deposition transcript of Edward O'Brien.

6. Exhibit D, filed herewith, are true and complete copies of certain pertinent pages of the deposition transcript of Christopher Abreu.
7. Exhibit E, filed herewith, are true and complete copies of certain pertinent pages of the deposition transcript of Francesco Ciambriello.
8. Exhibit F, filed herewith, is a true and complete copy of the transcript Motion to Dismiss hearing in the matter of Commonwealth v. Ciambriello.
9. Exhibit G, filed herewith, are true and complete copies of documents received from the Bristol County District Attorney's office, and were used as exhibits in the Abreu deposition.
10. Exhibit H, filed herewith, are true and complete copies of documents received from the Bristol County District Attorney's office, namely, the decision on the Motion to Dismiss, Commonwealth v. Ciambriello.
11. Exhibit I, filed herewith, is a true copy of an Affidavit of Gary Orlacchio.
12. Exhibit J, filed herewith are true and complete copies of documents received from the Bristol County District Attorney's office, namely a letter dated February 27, 2002 from Allison Romantz, along with a "receipt."
13. Exhibit K, filed herewith, is a true and complete copy of a document received from the Bristol County District Attorney's office, namely, the March 4, 2003 fax from David Ardito to Jeanne Veenstra.

14. Exhibit L, filed herewith, is a true and complete copy of a document received from the Bristol County District Attorney's office, namely, the March 20, 2002 letter from David Ardito to Allison Romantz
15. Exhibit M, filed herewith, is a true and complete copy of a document received from the Bristol County District Attorney's office, namely, the March 18, 2002 letter from Jeanne Veenstra to David Ardito.
16. Exhibit N, filed herewith, is a true and complete copy of a document received from the Bristol County District Attorney's office, namely, the February 20, 2002 letter from David Ardito to AMSA.
17. Exhibit O, filed herewith, is a true and complete copy of an affidavit of David Ardito.
18. Exhibit P, filed herewith, is a true and complete copy of an affidavit of Jeanne Veenstra.
19. Exhibit Q, filed herewith, is a true and complete copy of a document received from the Bristol County District Attorney's office, namely, an affidavit signed by David Ardito dated July 30, 2003.

Signed under penalty of perjury this 10th day of February, 2006.


William J. McLeod